



# SUSTAINABILITY POLICY OVERVIEW

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- 1 Consider **ESG risks and opportunities associated with target companies** when evaluating whether to invest in a particular company or entity, as well as during the period of ownership.

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- 2 Seek to grow and improve the companies in which we invest for **long-term sustainability** through operational improvements.

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- 3 Seek to use governance structures that provide **appropriate levels of oversight** in the areas of audit, risk management and potential conflicts of interest and to implement compensation and other policies that align the interests of owners and management.

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- 4 Proactively assist portfolio companies with **ensuring compliance with applicable national, state, and local environmental laws**.

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- 5 Seek to ensure and remain committed to assisting portfolio companies with: **compliance with applicable national, state, and local labor laws** in their locales and providing a **safe and healthy workplace** in conformance with national and local law.

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- 6 Maintain strict policies that **prohibit bribery and other improper payments**, including compliance with the U.S. Foreign Corrupt Practices Act, similar laws in other countries, and the OECD Anti-Bribery Convention.

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- 7 Seek to confirm that investments do not flow to companies that utilize child or forced labor.

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- 8 Provide timely information to limited partners on the matters addressed herein, and **work to foster transparency about ESG activities**.

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- 9 **Encourage portfolio companies to advance these same principles** in a way which is consistent with their fiduciary duties.

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- 10 **Strive to hold Graham Partners to the same sustainability standards as our portfolio companies**, where applicable.